

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

**DEFENDANT CENTURYLINK,
INC.'S MOTION TO ENFORCE
PRELIMINARY APPROVAL ORDER**

This Document Relates to:

0:17-cv-02832	0:17-cv-04943
0:17-cv-04613	0:17-cv-04944
0:17-cv-04614	0:17-cv-04945
0:17-cv-04615	0:17-cv-04947
0:17-cv-04616	0:17-cv-05046
0:17-cv-04617	0:18-cv-01562
0:17-cv-04618	0:18-cv-01565
0:17-cv-04619	0:18-cv-01572
0:17-cv-04622	0:18-cv-01573

Defendant CenturyLink, Inc. (“CenturyLink”), through undersigned counsel, hereby moves this Court to enforce its Preliminary Approval Order (ECF No. 528) and Mem. and Order (ECF No. 569), which ordered class members to comply with Settlement Agreement § 6.2 in submitting opt outs. The Mass Opt Out submitted by Keller Lenkner LLC (ECF No. 631) does not comply with requirements § 6.2.1.2 or 6.2.1.5 because it lacks individual signatures from class members and lacks account numbers or identification numbers. CenturyLink further requests that the Court resolve CenturyLink’s Motion to Disqualify Counsel and Require Corrective Notice (ECF No. 634) before considering any opt outs from Keller’s clients.

This Motion is based upon all the files, records, and proceedings in this matter, including the memorandum of law and all declarations and exhibits thereto that will be filed and served in accordance with Local Rule 7.1, and the arguments of counsel.

Dated: April 16, 2020

Respectfully submitted,

/s/ Douglas P. Lobel

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